## **REMARKS**

Claims 1-16 stand rejected under 35 USC § 102 (b) as being anticipated by USP 4,436,782 directed to Ho. Support for the rejection is cited in the abstract, column 2 line 17 – column 3 line 21, and the example.

Among the salient features of Applicant's invention are included the following:

A solid state polymerization reactor

A crystallizer

The removal of heat from hot pellets from the solid state polymerization reactor Transferring heat removed to heat cooled pellets as the feed to the crystallizer.

The rejection is traversed for the reason that none of these features are disclosed by Ho. The sections cited by the Examiner in Ho are directed to a melt phase polycondensation reactor producing molten polyester polymer which is forced through a pelletizing head by a gear pump, allowing the molten droplets from the pelletizing head to fall through in inert gas into a quenching water tank, removing the pellets from the water tank, and then allowing the pellets to dry. None of the disclosure relied upon in the Office Action has anything to do with crystallization and subsequent solid state polymerization process, both of which occur after melt phase polycondensation. With respect to crystallization, Ho only teaches that the amorphous pellets formed by the process described in Ho can then be crystallized (column 3, lines 7-9).

Nothing in Ho discloses or teaches the introduction of crystallized pellets into a solid state polymerization reactor, the removal of heat from hot pellets in the solid state polymerization reactor, or the transferal of the heat to the pellets feeding a crystallizer.

For these reasons, Applicants respectfully submit that Claims 1-16 are not anticipated by Ho.

Moreover, Ho does not disclose the heat exchanger in limitations of Claim 2, physically co-locating a first and second heat exchanger in one device as in Claim 3, the other heat exchanger limitations of Claims 4-15, or the type of heat exchanger, a first and second heat exchanger, the configuration of the heat exchangers, the loop configurations, or the further heating of the pellets exiting the crystallizer as in Claim 16.

For these reasons, Applicants respectfully request withdrawal of the rejections of Claims 1-16.

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The Examiner is invited to contact the undersigned with any questions related to the further prosecution of this application.

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Respectfully submitted,

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CERTIFICATE OF MAILING UNDER 37 CFR 1.8(a)

I hereby certify that this paper (along with any referred to as being attached or enclosed) is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, Mail Stop

Amendment, P. O. Box 1450, Alexandria, VA 22313-1450.

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